

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

NICOLE THOMPSON,  
Plaintiff,  
vs.  
TRW AUTOMOTIVE U.S. LLC, et al.,  
Defendants.

CASE NO. 2:09-cv-1375-JAD-PAL

**AMENDED TRIAL STIPULATION  
REGARDING PLAINTIFF'S  
PREGNANCY AND DELIVERY**

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
AUG 26 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

The parties have reached certain agreements concerning medical expenses related to Plaintiff's pregnancy and C-Section delivery and propose the following instruction be given to the jury:

**1. The parties have agreed that certain facts be placed in evidence as Exhibit 215. You should therefore treat the fact below as having been proved.**

a. As a result of Plaintiff's carotid artery dissection and the stent placement, she required the treatment described in Exhibit 215a, 215b and 215c.

**2. Exhibit 215 includes medical records related to Plaintiff's pregnancy and C-Section delivery.**

a. The total cost of the treatment described in Exhibit 215 was \$11,606.00 (\$420 from Essential Women's Health [215a], \$3,186 from High Risk Pregnancy [215b] and \$8,000 from St. Rose Hospital [215c]). The charges for the treatment described in Exhibit 215 are already included in Exhibit 25, which is a list of Plaintiff's medical bills.

**3. However, in considering Exhibit 215:**

a. You must still decide whether the non-deployment of the air bag legally caused, as legal cause is defined by the Judge, Plaintiff's carotid artery dissections and any of the treatment provided to Plaintiff as a result of the dissections, including without limitation Plaintiff's pregnancy-related and C-section delivery related costs.

1 In addition to reading this instruction to the jury, the Parties agree that Exhibit 215 will  
2 be admitted and will include identical language (paragraphs 1 through 3) at the beginning of the  
3 Exhibit 215.

4 DATED this 25th day of August, 2014.

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IT IS SO ORDERED this 26<sup>th</sup> day of August, 2014.

  
U.S. DISTRICT COURT JUDGE